

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	DATE FILED: _____
v.	:	CRIMINAL NO. _____
JEFFREY THOMAS	:	Violations: 18 U.S.C. § 641
PETER CAMPBELL	:	(Theft of government property - 29 Counts)
NATHAN CRAWFORD	:	
RICKY FARMER	:	18 U.S.C. § 1028(a)(7)
ALLAN FRANCIS	:	(Transfer of means of identification of
AUGUST PAULINE	:	another person to commit a federal crime -
CONNIE POLLARD	:	1 Count

INDICTMENT

COUNTS ONE THROUGH TWENTY-NINE

THE GRAND JURY CHARGES THAT:

At all times material to this Indictment:

1. The United States Postal Service was an agency of the United States engaged in the business of selling postal products, including stamps, to members of the public, at post offices and postal retail stores, which were located in all fifty states, including the Eastern District of Pennsylvania.

2. Defendant JEFFREY THOMAS recruited others known and unknown to the grand jury, including defendants PETER CAMPBELL, NATHAN CRAWFORD, RICKY FARMER, ALLAN FRANCIS, AUGUST PAULINE, and CONNIE POLLARD, to purchase postal products at United States Post Offices using checks drawn on accounts that were closed or did not contain sufficient funds to pay for the purchases, or using counterfeit checks. In addition to providing them with checks, defendant JEFFREY THOMAS also provided defendants PETER CAMPBELL, NATHAN CRAWFORD, RICKY FARMER, and ALLAN FRANCIS with false

Pennsylvania drivers' licenses in the names of the account holders on the checks to use as identification.

3. On or about the following dates, in the Eastern District of Pennsylvania, the defendants named below knowingly stole and converted to their own use, and did knowingly aid and abet the theft and conversion of, a thing of value of the United States, that is postal products, including stamps, by passing the following worthless and counterfeit checks to the United States Postal Service in payment for postal products:

<u>COUNT</u>	<u>DEFENDANT</u>	<u>Date</u>	<u>Name on Account</u>	<u>Financial Institution</u>	<u>Check No.</u>	<u>Amount of Check</u>	<u>Location of Post Office</u>
1	Jeffrey Thomas Peter Campbell	5/20/99	Peter Campbell	PNC Bank	3650	\$660	Norristown, PA
2	Jeffrey Thomas Peter Campbell	5/20/99	Peter Campbell	CoreStates Bank	3652	\$587.40	Blue Bell, PA
3	Jeffrey Thomas Ricky Farmer	5/20/99	Ricky N. Former	CoreStates Bank	3638	\$660	Norristown, PA
4	Jeffrey Thomas Ricky Farmer	5/20/99	Ricky N. Former	PNC Bank	3640	\$369.60	Blue Bell, PA
5	Jeffrey Thomas Peter Campbell	6/18/99	Peter Cimpbell	CoreStates Bank	4511	\$990	Norristown, PA
6	Jeffrey Thomas Peter Campbell	6/18/99	Peter Cimpbell	CoreStates Bank	4512	\$990	Blue Bell, PA
7	Jeffrey Thomas Ricky Farmer	6/18/99	Nicky Nilson Former	CoreStates Bank	3727	\$825	Norristown, PA
8	Jeffrey Thomas Nathan Crawford	6/24/99	Nathan Crawford	CoreStates Bank	5649	\$660	Norristown, PA
9	Jeffrey Thomas Nathan Crawford	6/24/99	Nathan Crawford	CoreStates Bank	5652	\$660	Bala Cynwyd, PA

<u>COUNT</u>	<u>DEFENDANT</u>	<u>Date</u>	<u>Name on Account</u>	<u>Financial Institution</u>	<u>Check No.</u>	<u>Amount of Check</u>	<u>Location of Post Office</u>
10	Jeffrey Thomas Nathan Crawford	6/29/99	Nathan Crawford	First Union	5658	\$660	Wynnewood, PA
11	Jeffrey Thomas Nathan Crawford	7/1/99	Nathan Crawford	First Union	5664	\$660	Blue Bell, PA
12	Jeffrey Thomas Nathan Crawford	7/19/99	Nathan Crawford	First Fidelity Bank	5803	\$660	Media, PA
13	Jeffrey Thomas Nathan Crawford	8/17/99	Nathan Crawford	Mellon PSFS	4229	\$495	Wynnewood, PA
14	Jeffrey Thomas August Pauline	4/14/03	August Pauline	PNC Bank	225	\$555	Conshohocken, PA
15	Jeffrey Thomas August Pauline	4/14/03	August Pauline	PNC Bank	226	\$555	Philadelphia, PA
16	Jeffrey Thomas August Pauline	4/14/03	August Pauline	PNC Bank	227	\$555	Gladwyne, PA
17	Jeffrey Thomas August Pauline	4/14/03	August Pauline	PNC Bank	230	\$555	Plymouth Meeting, PA
18	Jeffrey Thomas August Pauline	4/14/03	August Pauline	PNC Bank	231	\$555	Lafayette Hill, PA
19	Jeffrey Thomas August Pauline	4/14/03	August Pauline	PNC Bank	233	\$555	Broomall, PA
20	Jeffrey Thomas August Pauline	4/16/03	August Pauline	PNC Bank	234	\$555	Philadelphia, PA
21	Jeffrey Thomas August Pauline	4/16/03	August Pauline	PNC Bank	235	\$555	Philadelphia, PA
22	Jeffrey Thomas August Pauline	4/16/03	August Pauline	PNC Bank	236	\$555	Philadelphia, PA
23	Jeffrey Thomas August Pauline	4/16/03	August Pauline	PNC Bank	239	\$555	Philadelphia, PA
24	Jeffrey Thomas Connie Pollard	4/25/03	Connie Pollard	PNC Bank	126	\$555	Philadelphia, PA
25	Jeffrey Thomas Connie Pollard	4/25/03	Connie Pollard	PNC Bank	128	\$555	Philadelphia, PA

<u>COUNT</u>	<u>DEFENDANT</u>	<u>Date</u>	<u>Name on Account</u>	<u>Financial Institution</u>	<u>Check No.</u>	<u>Amount of Check</u>	<u>Location of Post Office</u>
26	Jeffrey Thomas Allan Francis	10/20/ 03	A.J.	Philadelphia Telco	265	\$569	Philadelphia, PA
27	Jeffrey Thomas Allan Francis	10/20/ 03	A.J.	Philadelphia Telco	266	\$529.10	Conshohocken, PA
28	Jeffrey Thomas	10/20/ 03	A.J.	Philadelphia Telco	269	\$555	Plymouth Meeting, PA
29	Jeffrey Thomas Allan Francis	10/20/ 03	A.J.	Philadelphia Telco	270	\$754	Lafayette Hill, PA

All in violation of Title 18, United States Code, Sections 641 and 2.

COUNT THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 20, 2003, at Abington Township, in the Eastern District of Pennsylvania defendant

JEFFREY THOMAS

knowingly and without lawful authority transferred a means of identification of another person, that is, the name A. J., as reflected on a false Pennsylvania driver's license, with the intent to use this means of identification to commit and to aid and abet the commission of a violation of Title 18, United States Code, Section 641, that is, the purchase of postage stamps from the United States Postal Service with counterfeit checks, and thereby affected interstate commerce.

In violation of Title 18, United States Code, Sections 1028(a)(7) and (c)(3)(A).

A TRUE BILL:

FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**